

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AIU INSURANCE COMPANY,	:	
	:	
Plaintiff,	:	
	:	
-against -	:	Civil Action No. 07 CIV 7052
	:	
TIG INSURANCE COMPANY,	:	
	:	
Defendant.	:	
	:	

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TIG INSURANCE COMPANY'S FIRST SET OF DOCUMENT REQUESTS

Defendant TIG Insurance Company, as successor-in-interest to International Insurance Company, ("TIG"), pursuant to Rule 34 of the Federal Rules of Civil Procedure, requests that Plaintiff AIU Insurance Company, produce the following documents at the offices of Butler Rubin Saltarelli & Boyd, 70 W. Madison, Suite 1800, Chicago, Illinois 60602, within thirty (30) days of service.

DEFINITIONS AND INSTRUCTIONS

1. "Plaintiff" means AIU Insurance Company, its predecessors, successors, and assigns, and all other persons acting or purporting to act on its behalf, individually or collectively, including but not limited to any officers, directors, employees, partners, corporate parent, subsidiaries or affiliates of AIU Insurance Company, such as AIG Insurance Company.
2. "Reinsurance Contracts" means those contracts defined in the Paragraph 12 of the Complaint as the "Reinsurance Agreements," specifically certificate numbers CFR-0062,

22. Produce all documents provided to any person who is retained or specially employed to, or who otherwise will, provide expert testimony in this case.
23. For each person who is retained or specially employed to, or who otherwise will, provide expert testimony in this case, produce all documents and information required under Rule 26(a)(2) of the Federal Rules of Civil Procedure, and in addition, produce all draft reports prepared by all such persons.
24. Produce all documents relating to the guidelines or procedures used by Plaintiff to prepare, process and issue notices to reinsurers, claims against reinsurers, and to issue bills to reinsurers, including, but not limited to formal or informal guidelines, manuals, bulletins, and memoranda.
25. Produce all documents provided to, or resolutions and minutes of, Plaintiff's Board of Directors and of any committees of the Board of Directors concerning or mentioning Foster Wheeler asbestos claims or losses, Defendant or the Reinsurance Contracts or the billings referred to in the Complaint.
26. Produce all documents provided to, or resolutions and minutes of, the Plaintiff's Board of Directors and of any committees of the Board of Directors concerning or mentioning guidelines or procedures for processing reinsurance claims, including, but not limited to formal or informal guidelines, manuals, bulletins, and memoranda.
27. Produce all documents provided to, or resolutions and minutes of, the Board of Directors and of any committees of the Board of Directors of Defendants concerning or mentioning guidelines or procedures for identifying, preparing, processing and issuing reinsurance